IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

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| IN RE: | * | |
| | * | |
| Tracey J. Firmin (xxx-xx-6456) | * | Case No. 17-10091 |
| Rebecca A. Firmin (xxx-xx-7375) | * | |
| 311 W. Drew | * | |
| Kirbyville, TX 75956 | * | Chapter 13 |
| Debtors | * | |

TRUSTEE'S OBJECTION TO DEBTOR'S
EXEMPTIONS FILED ON 2/9/17

**NO HEARING WILL BE CONDUCTED ON THIS OBJECTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT, 300 WILLOW, SUITE 112, BEAUMONT, TX, AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUESTS FOR HEARING. THE COURT WILL THEREAFTER SET A HEARING. IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

Comes Now, John J. Talton, Chapter 13 Trustee, and files this his Objection to Debtor's Exemptions filed in the above styled case and for cause would show the following:

1. The Debtors have improperly declared the following real or personal property exempt: portable building under 11 U.S.C. § 522(d)(3). In particular, the Debtors are allowed to claim household furnishings, household goods, wearing apparel, appliances, books, animals, crops or musical instruments under the statute in question. A portable building does not qualify for exemption under 11 U.S.C. § 522(d)(3).

Wherefore, premises considered, John J. Talton, Trustee, prays that the Court enter an order disallowing the Debtors' exemptions filed 2/9/17, for the portable building, and for such other and further relief as is just and equitable.

Respectfully submitted,

John J. Talton, Chapter 13 Trustee

/s/ John J. Talton
John J. Talton, Trustee, SBN 19629700
Lloyd T. Kraus, Staff Attorney, SBN 24066773
110 N. College Suite 1200
Tyler, TX 75702
(903) 593-7777; FAX (903) 597-1313

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Trustee's Objection to Debtor's Exemptions has been served upon the following parties in interest by mailing a copy of same to them via first class mail or electronically on 3/21/17:

Steven Packard
1240 Orleans St.
Beaumont, TX 77701

Mr. & Mrs. Tracey J. Firmin
311 W. Drew
Kirbyville, TX 75956

/s/ John J. Talton
John J. Talton